



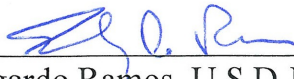
MEMO ENDORSED

April 17, 2020

VIA CM/ECF

The Honorable Edgardo Ramos
Thurgood Marshall United States Courthouse
40 Foley Square, Room 619
New York, NY 10007

The application is X granted
_____ denied



Edgardo Ramos, U.S.D.J.
Dated: 4/20/20
New York, New York

Re: *Wiener v. AXA Equitable Life Insurance Company, et al.*: 1:16-cv-04019-ER

Dear Judge Ramos:

Pursuant to Rule 5.2 of the Federal Rules of Civil Procedure, Plaintiff respectfully moves for an Order sealing Plaintiff's Memorandum in Support of Plaintiff's Motion for Partial Summary Judgment and Exhibits E, F, H, K, M, and Q to Plaintiff's Memorandum in Support. Plaintiff's Memorandum in Support contains excerpts from Defendant AXA Equitable Life Insurance Company's confidential and proprietary life insurance manual. Exhibits E, F, H, K, Q also include confidential and proprietary information and testimony concerning Defendants' business. Exhibit M includes a copy of a check with Plaintiff's account information and Exhibit H is Plaintiff's life insurance reinstatement application, which includes Plaintiff's confidential medical information.

Counsel for Plaintiff has conferred with counsel for Defendants and they support the sealing of these documents.

Plaintiff respectfully requests this letter motion be granted in its entirety and an Order be issued sealing Plaintiff's Memorandum in Support and Exhibits E, F, H, K, M, and Q to Plaintiff's Memorandum in Support.

Sincerely,

/s/Theresa A. Guertin
Theresa A. Guertin, Esq.

/s/Lawrence F Reilly
Lawrence F. Reilly, Esq.

cc: Counsel of Record via CM/ECF